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March 30, 2022

Via ECFI

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street
United States Courthouse, Courtroom 14A
New York, NY 10007

Re: *Grant et al. v. Trump et al.*, Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

This firm represents plaintiffs Edmond Grant p/k/a “Eddy Grant”, Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company in the above-referenced action. We write with consent from defendants Donald J. Trump and Donald J. Trump For President, Inc. and pursuant to Your Honor’s Individual Practices Rule I.E. to request a 60 day extension for the parties to complete discovery. Both parties have issued written discovery and an exchange of documents has taken place, and the parties anticipate completing document productions by the existing fact discovery end date of April 22, 2022. However, additional time is needed to schedule and take the depositions of the parties. This is the first request for an extension of the discovery schedule. Because the requested extension affects other scheduled dates in the Case Management Plan dated November 3, 2021, a proposed Revised Scheduling Order is attached hereto as Exhibit A for the Court’s review and approval. The parties request that the Court so order the Revised Scheduling Order if it finds the same acceptable.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Brett Van Benthysen
Brett Van Benthysen

Encl.

cc: Counsel of Record

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